

215 South Cascade Street
PO Box 496
Fergus Falls, Minnesota 56538-0496
218 739-8200
www.otpc.com (web site)



May 29, 2014

Dr. Burl W. Haar
Executive Secretary
Minnesota Public Utilities Commission
121 7th Place East, Suite 350
St. Paul, MN 55101-2147

Re: In the Matter of Comments Submitted by the Department of Commerce, Division of Energy Resource on Otter Tail Power Company's Amended Compliance Filing Docket No. E017/M-13-103 Reply Comments

Dear Dr. Haar:

On May 21, 2014, the Department of Commerce, Division of Energy Resources ("the Department") submitted Comments regarding Otter Tail Power Company's ("Otter Tail's") Amended Compliance Filing to the Minnesota Public Utilities Commission ("Commission") on April 30, 2014 in the above referenced Docket.

In the Department's Comments, the Department acknowledges that they have reviewed and agree with the revised annual revenue requirement calculations in the Amended Compliance Filing.

The Department also states in its Comments that it believes the Commission will need to approve Otter Tail's request to keep current rates in place instead of implementing the new rates calculated in the Amended Compliance filing. Otter Tail made the request to keep current rates in effect because the rates computed in the Amended Compliance Filing are not materially different from the rates Otter Tail currently has in place. In addition, Otter Tail just filed another Annual Update to its Transmission Cost Recovery Rider ("TCRR")¹. Otter Tail would like to avoid the customer impact of implementing two rate changes within just a few months by simply keeping the current rates in effect and then implementing updated rates following issuance of an Order in the new TCRR docket. The Department states they do not oppose Otter Tail's proposal to keep current rates in effect.

¹ This Annual Update was filed on May 1, 2014, MPUC Docket No. E017/M-14-375

Otter Tail agrees with the Department's assessment that only the Commission has the authority to approve Otter Tail's request to keep current rates in effect, as put forth in the Amended Compliance Filing. Otter Tail respectfully seeks Commission approval of that request at its earliest convenience.

If you have any questions regarding this filing, please contact me at 218-739-8279 or stommerdahl@otpc.com.

Sincerely,

/s/ Stuart Tommerdahl
Stuart Tommerdahl
Manager, Regulatory Administration

jce
By electronic filing
c: Service List

CERTIFICATE OF SERVICE

**RE: In the Matter of Comments Submitted by the Department of Commerce,
Division of Energy Resource on Otter Tail Power Company's *Amended
Compliance Filing*
Docket No. E017/M-13-103**

I, Jana Emery, hereby certify that I have this day served a copy of the following, or a summary thereof, on Dr. Burl W. Haar and Sharon Ferguson by e-filing, and to all other persons on the attached service list by electronic service or by First Class mail.

**Otter Tail Power Company
Reply Comments**

Dated this **29th** day of **May, 2014**

/s/ JANA EMERY

Jana Emery
Regulatory Filing Coordinator
Otter Tail Power Company
215 South Cascade Street
Fergus Falls MN 56537
(218) 739-8879

| First Name | Last Name | Email | Company Name | Address | Delivery Method | View Trade Secret | Service List Name |
|------------|------------|-------------------------------|------------------------------------|--------------------------------------------------------------------|--------------------|-------------------|------------------------|
| Julia | Anderson | Julia.Anderson@ag.state.mn.us | Office of the Attorney General-DOC | 1800 BRM Tower 445 Minnesota St St. Paul, MN 551012134 | Electronic Service | Yes | OFF_SL_13-103_Official |
| Sharon | Ferguson | sharon.ferguson@state.mn.us | Department of Commerce | 85 7th Place E Ste 500 Saint Paul, MN 551012198 | Electronic Service | No | OFF_SL_13-103_Official |
| Bruce | Gerhardson | bgerhardson@otpc.com | Otter Tail Power Company | PO Box 496 215 S Cascade St Fergus Falls, MN 565380496 | Electronic Service | No | OFF_SL_13-103_Official |
| Burl W. | Haar | burl.haar@state.mn.us | Public Utilities Commission | Suite 350 121 7th Place East St. Paul, MN 551012147 | Electronic Service | Yes | OFF_SL_13-103_Official |
| John | Lindell | agorud.ecf@ag.state.mn.us | Office of the Attorney General-RUD | 1400 BRM Tower 445 Minnesota St St. Paul, MN 551012130 | Electronic Service | Yes | OFF_SL_13-103_Official |
| Stuart | Tommerdahl | stommerdahl@otpc.com | Otter Tail Power Company | 215 S Cascade St PO Box 496 Fergus Falls, MN 56537 | Electronic Service | No | OFF_SL_13-103_Official |